



**U.S. Department of Justice**

United States Attorney  
Western District of Tennessee  
Eastern Division

109 South Highland, Suite 300  
Jackson, Tennessee 38301

Telephone (731)422-6220  
Fax (731)422-6668

March 26, 2018

**Ruchee J. Patel**  
**202 Adams Avenue**  
**Memphis, TN 38103**

**RE: United States v. Tony Douglas**  
**CR. No. 18-10001-JDB**

Dear Mr. Patel:

This letter is in response to your letter for discovery which was received by our office. Pursuant to your discovery request, the United States has enclosed the following in accordance with Rule 16 of the Federal Rules of Criminal Procedures:

Materials enclosed include documents numbered TD-1 through TD-72 and Cole et al-1 through Cole et al-2529. In the video files, you will need to access the files entitled "smartclient-player.exe. The password for accessing your hard drive files is being sent via email. ***Please note the Order of Protection attached hereto related to this discovery.***

All evidence is available to be tested, copied, inspected, or photographed as often as necessary at a mutually convenient time. Please contact me to arrange a time for access to this evidence. If any page, or item listed is not included with this letter, please contact me so that I can provide you with the document.

I am unaware of any exculpatory evidence at this time. However, if I become aware of any such evidence I will contact you immediately.

Feel free to contact me at your convenience so that we can discuss any further discovery matters. I will provide you an opportunity to review my complete file, subject to a few conditions. Any effort to settle this case needs to be completed prior to the hearing of any motions you may file. If you have any questions, please call me.

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Mr. Ruchee J. Patel

Based upon your request for discovery, I, in turn hereby request any reciprocal discovery you may have that is provided by Rule 16(b), Fed.R.Crim.P. Additionally, pursuant to Fed.R.Crim.P. 12.1, the government requests that the defendant notify the attorney for the government in this cause of any intended alibi defense.

Respectfully,

s/Beth C. Boswell  
Beth C. Boswell  
Assistant United States Attorney

cc: United States District Court Clerk (without enclosures)  
Enclosure